

# EXHIBIT A

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**Subject:** FWC - Challenge (8) to "Confidential" Designations  
**Date:** Monday, September 11, 2023 at 9:30:13 AM Eastern Daylight Time  
**From:** Corey Stern  
**To:** Michael A. Olsen, Jim Campbell  
**CC:** Melanie Daly, Ted Leopold, Jordan Connors, Steve Morrissey, Paul Novak, Hunter Shkolnik, Patrick Lanciotti, Hunter Shkolnik, Richard Kuhl, Margaret Bettenhausen, TMendel, Bill Kim, Sheldon Klein, Rick Berg, Wayne B. Mason, David C. Kent, Philip Erickson, Susan Smith, Brian MacDonald, Todd Weglarz, Donald Dawson, Michael L. Williams, Eric A. Rey, Alaina Devine, Kristin M. Dupre, Richard P. Campbell, Andreas Ringstad, Jack J. O'Donnell, John R. Penhallegon, Chris Muha, Christopher R. Howe, Christopher D. Fletcher, William C. Cahill, Kelly Kramer, Kristin Silverman, Mark Ter Molen, William Sinnott, Minh Olivier Nguyen-Dang, Chris Weld, Thompson, Craig S., travis.gamble@faegredrinker.com, vance.wittie@faegredrinker.com, Moshe S. Maimon, Jerome Block, Kiersten Holms

**Attachments:** 2023.09.11 Letter to Veolia (8th Confidential Designations).pdf  
Counsel for Veolia:

See correspondence attached.

Very Truly Yours,

Corey M. Stern  
Levy Konigsberg, LLP  
605 Third Avenue, 33<sup>rd</sup> Floor  
New York, New York 10158  
(212)605-6298  
(212)605-6290 (facsimile)  
www.levylaw.com

**LEVY KONIGSBERG LLP**  
**ATTORNEYS AT LAW**  
**605 THIRD AVENUE, 33<sup>RD</sup> FLOOR**  
**NEW YORK, NY 10158**

NEW JERSEY OFFICE  
QUAKERBRIDGE EXECUTIVE OFFICE  
101 GROVERS MILL ROAD  
LAWRENCEVILLE, NJ 08648  
TELEPHONE: (609) 720-0400  
FAX: (609) 720-0457

(212) 605-6200  
FAX: (212) 605-6290  
WWW.LEVYLAW.COM

ALBANY OFFICE  
90 STATE STREET  
ALBANY, NY 12207  
TELEPHONE: (518) 286-5068

Writer's Direct Email: [cstern@levylaw.com](mailto:cstern@levylaw.com)

September 11, 2023

**VIA EMAIL & CERTIFIED MAIL (RRR)**

James Campbell, Esq.  
Campbell Conroy & O'Neil, P.C.  
200 City Square, Suite 300  
Boston, MA 02129

Michael A. Olsen, Esq.  
Mayer Brown, LLP  
71 South Wacker Drive  
Chicago, IL 60606

**RE: IN RE FLINT WATER CASES – PRODUCTION OF DOCUMENTS**  
**CHALLENGE (8) TO “CONFIDENTIAL” DESIGNATIONS**

Mr. Campbell, Mr. Olsen:

Please be advised that pursuant to the Court's Confidentiality Order,<sup>1</sup> Plaintiffs hereby formally challenge the “Confidential,” “Highly Confidential,” and/or “Highly Confidential – Attorneys' Eyes Only” designations of the following documents:<sup>2</sup>

1. VWNAOS555522-  
VWNAOS555522.0001
2. VWNAOS254034-  
VWNAOS254034.0004
3. VWNAOS537544-  
VWNAOS537544.0002
4. VWNAOS526905-  
VWNAOS526905.0002
5. VWNAOS528168-  
VWNAOS528168.0008
6. VWNAOS528207-  
VWNAOS528207.0010

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<sup>1</sup> See Case No. 16-cv-10444 (ECF. No. 1255-3).

<sup>2</sup> Some documents/groups of documents appear to be duplicative but were produced numerous times with varying Bates numbers.

7. VWNAOS190783-  
VWNAOS190783.0005
8. VWNAOS528288-  
VWNAOS528288.0001
9. VWNAOS528228-  
VWNAOS528228.0002
10. VWNAOS189785-  
VWNAOS189785.0001
11. VWNAOS528229-  
VWNAOS528229.0002
12. VWNAOS528165-  
VWNAOS528165.0004
13. VWNAOS528602-  
VWNAOS528602.0001
14. VWNAOS248946-  
VWNAOS248946.0011
15. VWNAOS249107-  
VWNAOS249107.0008
16. VWNAOS528155-  
VWNAOS528155.0001
17. VWNAOS249167-  
VWNAOS249167.0020
18. VWNAOS254021-  
VWNAOS254021.0004
19. VWNAOS249162-  
VWNAOS249162.0003
20. VWNAOS527011-  
VWNAOS527011.0001
21. VWNAOS526982-  
VWNAOS526982.0001
22. VWNAOS528589-  
VWNAOS528589.0001
23. VWNAOS528601-  
VWNAOS528601.0003
24. VWNAOS528597-  
VWNAOS528597.0003
25. VWNAOS311336-  
VWNAOS311336.0002
26. VWNAOS219539-  
VWNAOS219539.0001
27. VWNAOS528302-  
VWNAOS528302.0002
28. VWNAOS528281-  
VWNAOS528281.0002
29. VWNAOS528577-  
VWNAOS528577.0001
30. VWNAOS528563-  
VWNAOS528563.0001

- 31. VWNAOS527039-  
VWNAOS527039.0003
- 32. VWNAOS528580-  
VWNAOS528580.0010
- 33. VWNAOS190634-  
VWNAOS190634.0004
- 34. VWNAOS190678-  
VWNAOS190678.0004
- 35. VWNAOS527059-  
VWNAOS527059.0001

These documents do not contain private, non-public, confidential, competitively sensitive, or proprietary information not readily ascertainable through lawful means by the public. Furthermore, if any of these documents were to be made public, such would not cause oppression, competitive disadvantage, infringement of privacy rights established by statute or regulation, or infringement of confidentiality requirements established by statute or regulation with respect to government purchasing or other operations.

This letter is a formal demand to withdraw all such designations **and to reproduce each document without any redactions**, whether noted herein or not.

Very Truly Yours,

**LEVY KONIGSBERG, LLP**



Corey M. Stern

Cc: *(By email only)*  
*Theodore Leopold & Jordan Connors (Class Counsel)*  
*Hunter Shkolnik & Patrick Lanciotti (Co-Liaison Counsel)*  
*Richard Kull & Margaret Bettenhausen (Counsel for the State)*  
*William Kim & Sheldon Klein (Counsel for the City of Flint)*  
*Wayne Mason & David Kent (Counsel for LAN/LAD)*  
*Craig Thompson (Counsel for Rowe)*  
*Susan Smith & Brian MacDonald (Counsel for McLaren)*  
*Todd Weglarz & Donald Dawson (Counsel for certain Legionella Plaintiffs)*  
*Michael Williams & Eric Rey (Counsel for the USEPA)*  
*All Veolia Entities' Counsel of Record or otherwise known*